DAVIS WRIGHT TREMAINE LLP DAN LAIDMAN (State Bar No. 274482) danlaidman@dwt.com DIANA PALACIOS (State Bar No. 290923) dianapalacios@dwt.com 865 South Figueroa Street, 24th Floor Los Angeles, California 90017-2566 Telephone: (213) 633-6800 Fax: (213) 633-6899 Attorneys for Defendant Joseph Teixeira UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA CITY OF INGLEWOOD, a public entity, Plaintiff, VS. JOSEPH TEIXEIRA and Does 1-10, OF JOSEPH TEIXEIRA IN	
11 Joseph Teixeira 12 UNITED STATES DISTRICT COURT 13 CENTRAL DISTRICT OF CALIFORNIA 14 CITY OF INGLEWOOD, a public entity, Case No. 2:15-cv-01815-MWF-MI 15 Plaintiff, Assigned to the Hon. Michael Fitzge 17 SUPPLEMENTAL DECLARATI	
CENTRAL DISTRICT OF CALIFORNIA CITY OF INGLEWOOD, a public entity, Case No. 2:15-cv-01815-MWF-MI Plaintiff, VS. SUPPLEMENTAL DECLARATI	
CITY OF INGLEWOOD, a public entity, Case No. 2:15-cv-01815-MWF-MI Plaintiff, Vs. SUPPLEMENTAL DECLARATI	
CITY OF INGLEWOOD, a public entity, Case No. 2:15-cv-01815-MWF-MI Plaintiff, Vs. SUPPLEMENTAL DECLARATI	
Plaintiff, VS. Plaintiff, SUPPLEMENTAL DECLARATI	RW
SUPPLEMENTAL DECLARATI	erald
IOSEPH TEIXEIR A and Does 1-10 OF IOSEPH TEIXEIR A IN	ON
SUPPORT OF DEFENDANT'S	
Defendants.) SUPPLEMENTAL REQUEST FO JUDICIAL NOTICE; EXHIBIT ()R G
Hearing Date: June 22, 2015	
Time: 10:00 a.m. Courtroom: 1600	
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SUPPLEMENTAL DECLARATION OF JOSEPH TEIXEIRA

- I, Joseph Teixeira, declare and state as follows:
- I am the defendant in this action. I am over eighteen years of age. I
 have personal knowledge of the facts contained in this declaration, except for those
 matters stated on information and belief, which I am informed and believe to be true.
 If called upon to testify, I could and would competently testify to these facts.
- 2. I have reviewed the Complaint in this action. Paragraph 14 and "Exhibit A" on page nine reference seven copyright registration applications filed by the City of Inglewood (the "City"). As described in my prior Declaration (Dkt. # 9-1), on April 1, 2015, I submitted a request to the City for copies of these seven applications pursuant to the California Public Records Act ("CPRA"). I did not receive any response from the City before my Motion to Dismiss and Motion to Strike were filed in this action on April 17, 2015.
- 3. On April 22, 2015, I received a letter from the City responding to my CPRA request and informing me that I could pick up the responsive documents at the City's offices. I picked up the records as soon as I was able to given my work schedule, and then provided them to my counsel in this matter. True and correct copies of the copyright registration applications that the City provided me pursuant to the CPRA are attached as Exhibit G.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed this 30day of April 2015, at Inglewood, California.

Joseph Teixeira

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EXHIBIT G



Receipt

Copyright Office Library of Congress 101 Independence Avenue SE Washington, DC 20559-6000



Date: 2/3/2015 12:32:11 PM

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Form(s):	7 PA			Search Report
Deposit Count:	10		Search	
Piece Count:	10			Retrieval
Type of Deposit:	dvd			Correspondence
Other Enclosures:				Inspection
Title:	City of Ingle	wood, Council Meeting	1	Photocopies
# of Additional Titles:	8/27/2013		2.	Additional Certificate
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Priority:				Secure Test Exam
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Received From: Mis	ty Law Group			Phone:
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Receipt of material is merely a preliminary step in the registration and/or recordation process. It does not imply that any final determination has been made in the case, or that the material is acceptable for registration.

Official action on an application for copyright registration or a document for recordation can be taken only after there has been a full examination of the claim following regular Copyright Office procedures. We are glad to discuss questions involving copyright registration on the telephone or in person-toperson conversations. However, all statements made during these exploratory discussions must be considered provisional, and are not binding either upon the applicant or upon the Office.

This receipt acknowledges delivery of the material to the Copyright Office on the date indicated. When multiple claims are submitted by or on behalf of the same remitter, however, only one receipt will be provided. If you are submitting multiple claims, only one title will appear on the receipt.

For a Work of Performing Arts UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

Privacy Act Notice: Sections 408-410 of title 17 of the *United States Code* authorize the Copyright Office to collect the personally identifying Information requested on this form in order to process the application for copyright registration. By providing this information you are agreeing to routine uses of the information that include publication to give legal notice of your copyright claim as required by 17 U.S.C. §705. It will appear in the Office's online catalog. If you do not provide the information requested, registration may be refused or delayed, and you may not be entitled to certain relief, remedies, and benefits under the copyright law.

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NOTE Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was 'made for hire' check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

MORE ON BACK ▶ *Complete all applicable spaces (numbers 5-9) on the reverse side of this page.

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CORRESPO	ONDENCE Give name and address to which	h correspondence about this app	lication should be sent. Name/Ad	dress/Apt/City/State/Zip▼	
JoAnna Me	ercedes Esty, Esq.				
Majesty La 9719 Pulas	ki Highway				
	ver, MD 21220				
Area code and	daytime telephone number (410) 686	6072	Fax number (888) 618	0360	
Email jmesty	y@majestylaw.com				
CERTIFICA	ATION* I, the undersigned, hereby certify the	nat I am the author			
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				101 Independence Avenue SE Washington, DC 20559-6230	

^{*17} U.S.C. §506(e): Any person who knowingly makes a faise representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filled in connection with the application, shall be fined not more than \$2,500.

Case 2:15-cv-01815-MWF-MRW Document 16-1 Filed 05/01/15

Page 7 of 18 A Page ID #:135 For a Work of Performing Arts UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

Privacy Act Notice: Sections 408-410 of title 17 of the *United States Code* authorize the Copyright Office to collect the personally identifying information requested on this form in order to process the application for copyright registration. By providing this information you are agreeing to routine uses of the information that include publication to give legal §705. It will ap the informati and you may under the cop

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17 U.S.C. §505(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

Library of Congress Copyright Office-PAD 101 Independence Av Washington, DC 20559-6230

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*17 U.S.C. §506(e): Any person who knowingly makes a talse representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

Case 2:15-cv-01815-MWF-MRW | Document 16-1 | Filed 05/01/15 | Bage 11 of 18 | Page ID

For a Work of Performing Arts UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

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> TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

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Case 2:15-cv-01815-MWF-MRW Document 16-1 Filed 05/01/1 Page ID
#:141 UNITED STATES COPYRIGHT OFFICE

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Privacy Act Notice: Sections 408-410 of title 17 of the *United States Code* authorize the Copyright Risco to collect the personally identifying information requested on official or in order to process the application for copyright registration. By providing this information you are agreeing to to give lega §705. It will the informa and you ma under the co

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to give legal no §705. It will app	itine uses of the information that include of your copyright claim as required in the Office's online catalog. If you	red by 17 U.S.C. u do not provide	EFFECTIVE DATI	L OF FILEBOTHAT	ION
	n requested, registration may be refu ot be entitled to certain relief, remedie right law.		Month	Day	Year
DO NOT WRIT	TE ABOVE THIS LINE. IF YOU NE	ED MORE SPACE, USE A SEPARATE CONTINUATIO	N SHEET.		
	TITLE OF THIS WORK ▼ City of Inglewood, Council M	eeting 4/23/13			×
	PREVIOUS OR ALTERNATIVE	TITLES ▼			
	NATURE OF THIS WORK ▼ Se	e instructions			
	Motion Picture/ AV Work				
	NAME OF AUTHOR V	r	DATES OF BIR Year Born ▼	TH AND DEAT Year Died	
	Was this contribution to the work a "work made for hire"? Yes	AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of Domiciled in Inglewood, CA	THE WORK Anonymous?	☐ Yes ☑ No	RIBUTION TO If the answer to either of these questions is "Yes," see detailed
NOTE Under the law.	NATURE OF AUTHORSHIP BUILDING	riefly describe nature of material created by this author in which	 Pseudonymous? h copyright is claimed 	Yes No	instructions.
the "author" of a "work made for hire" is generally the	NAME OF AUTHOR ▼		DATES OF BIR Year Born ▼	TH AND DEAT Year Died	
employer, not the employee (see instruc- tions). For any part of this	Was this contribution to the work a "work made for hire"? Yes	AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of	WAS THIS AU THE WORK — Anonymous?	THOR'S CONT	RIBUTION TO If the answer to either of these questions is
work that was "made for hire" check "Yes" in	□ No	OR Domiciled in	Pseudonymous?	Yes No	"Yes," see detailed Instructions.
the space provided, give the employer	NATURE OF AUTHORSHIP B	riefly describe nature of material created by this author in whic	h copyright is claimed	. •	
(or other person for whom the work was prepared)	NAME OF AUTHOR ▼		DATES OF BIR' Year Born ▼	TH AND DEAT Year Died	
as "Author" of that part, and leave the	Was this contribution to the work a "work made for hire"?	AUTHOR'S NATIONALITY OR DOMICILE Name of Country (Citizen of	WAS THIS AUTHE WORK	THOR'S CONT	RIBUTION TO If the answer to either of these questions is
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	NATURE OF AUTHORSHIP B	riefly describe nature of material created by this author in which	h copyright is claimed.	▼	
,	2013 mu	DEF THIS Information st be given all cesses. DATE AND NATION OF FIRST P Complete this information ONLY if this work has been published.	UBLICATION OF Day	THIS PARTICU	LORSWORK Nation
	COPYRIGHT CLAIMANT(S) No the author given in space 2. ▼ City of Inglewood	ume and address must be given even if the claimant is the same		ON RECEIVED	
See instructions	 W. Manchester Blvd Inglewood, CA 90301 		ONE DEPO	SIT RECEIVED	
before completing this space.	TRANSFER If the claimant(s) named	d here in space 4 is (are) different from the author(s) named in the claimant(s) obtained ownership of the copyright. ▼	DO NOT WRITE HER OFFICE USE ONLY WRITE HER O	SITS RECEIVED	
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MORE ON BACK ▶ Complete all applicable spaces (numbers 5-9) on the reverse side of this page.

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CORRESPONDENCE	FOR COPYRIGHT OFFICE
	USE
	ONLY

		ONLY
DO NOT WE	RITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.	
a. This is the	REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office? If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ▼ If your answer is No, do not check box A the first published edition of a work previously registered in unpublished form. The first application submitted by this author as copyright claimant. It changed version of the work, as shown by space 6 on this application.	, B, or C.
If your answe	er is "Yes," give: Previous Registration Number ▼ Year of Registration ▼	
	VE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation. Material Identify any preexisting work or works that this work is based on or incorporates. ▼	
		See instructions before completing this space.
Material Add	ded to This Work. Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.	this space.
DEPOSIT A Name ▼	ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of A Account Number ▼	ccount.
JoAnna Me Majesty La 9719 Pulasi Middle Riv Area code and d	ki Highway /er, MD 21220 daytime telephone number (410) 686 6072 Fax number (888) 618 0360	ip♥
	y@majestylaw.com	
CERTIFICA	ATION* I, the undersigned, hereby certify that I am the Check only one Check only one	e rignt(s) ▲
	of the work identified in this application and that the statements made by me in this application are correct to the best of my known	owledge.
- 24	nted name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date. 2/2/2015 Date	
	Handwritten signalsure (X) ▼ Cu M Zsty	24 = 14 ^{- 2}
Certificate will be mailed in	Name ▼ JoAnna Mercedes Esty, Majesty Law Group You must - Complete all necessary - Sign your application in SEND ALLS ELEME N THE SAME PACK	n space 8
window envelope to this	Number/Street/Apt ▼ 1. Application form 9719 Pulaski Highway 2. Nonrefundable filing te ey order payable to Regis	e in check or mon-
address:	3. Deposit material MAIL TO: Library of Congress Copyright Office-PAD 101 dependence Aven Washington, DC 20559-	ue SE 6230

¹⁷ U.S.C. §506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be lined not more than \$2,500.

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UNITED STATES COPYRIGHT OFFICE	

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Privacy Act Notice: Sections 408-410 of title 17 of the *United States Code* authorize the Copyright Disce to collect the personally identifying information requested on Fig. form in order to process the application for copyright registration. By providing this information you are agreeing to rou to give legal no §705. It will appe the information and you may no under the copy

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to give legal no §705. It will app the information	utine uses of the information that incl otice of your copyright claim as requi- sear in the Office's online catalog. If you in requested, registration may be refu- ted to entitled to certain relief, remedi- right law.	red by 17 U.S.C. u do not provide used or delayed,		VE DAT	Day	Year
DO NOT WRI	TE ABOVE THIS LINE. IF YOU NE	ED MORE SPACE, USE A SEPARATE CONTINUA	TION SHEET.			
	TITLE OF THIS WORK ♥ City of Inglewood, Council M	eeting 6/18/13				
	PREVIOUS OR ALTERNATIVE	TITLES ▼				
	NATURE OF THIS WORK ▼ Se	e instructions				
	Motion Picture/ AV Work					
	NAME OF AUTHOR TO City of Inglewood, Employe	r	DATES O		TH AND DEAT Year Died	
	Was this contribution to the work a "work made for hire"? Yes No	AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of Domiciled in Inglewood, CA	WAS TH THE WO Anonymo	ORK us?	THOR'S CONT Yes No Yes No	RIBUTION TO If the answer to either of these questions is "Yes," see detailed instructions.
NOTE Under the law,	NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼					
the "author" of a "work made for hire" is generally the employer, not	NAME OF AUTHOR ▼		DATES C Year Born		TH AND DEAT Year Died	
the employee (see instruc- tions). For any part of this work that was "made for hire"	Was this contribution to the work a "work made for hire"? Yes	AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of Domiciled in	WAS TH THE WO Anonymo	DRK us?	THOR'S CONT	RIBUTION TO If the answer to either of these questions is 'Yes,' see detailed instructions
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the employer (or other person for whom the work	NAME OF AUTHOR ▼		DATES (Year Born		TH AND DEAT Year Died	
was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.	Was this contribution to the work a "work made for hire"? Yes No	AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of Domiciled in refly describe nature of material created by this author in v	THE WO Anonymou Pseudonym	DRK us? mous?	THOR'S CONT	RIBUTION TO If the answer to either of these questions is "Yes," see detailed instructions.
	YEAR IN WHICH CREATION C WORK WAS COMPLETED THI					borgwork Nation
	COPYRIGHT CLAIMANT(S) Not the author given in space 2. ▼ City of Inglewood 1 W. Manchester Blvd	nme and address must be given even if the claimant is the s	ш		ON RECEIVED	
See instructions before completing this space.	Inglewood, CA 90301 TRANSFER If the claimant(s) named	f here in space 4 is (are) different from the author(s) named) DEPO	SITS RECEIVED	
	space 2, give a brief statement of how	the claimant(s) obtained ownership of the copyright.	80	ns aec	CEIVED	

See instructions before completing this space.

MORE ON BACK ▶ Complete all applicable spaces (numbers 5-9) on the reverse side of this page.

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	CORRESPONDENCE Yes	FOR COPYRIGHT OFFICE
		ONLY

		CORRESPONDENCE Yes	COPYRIGHT OFFICE USE ONLY
DO NOT WE	RITE ABOVE THIS LINE. IF YOU NEED MORE SPA	ACE, USE A SEPARATE CONTINUATION SHEET.	
PREVIOUS	REGISTRATION Has registration for this work, or for a	an earlier version of this work, already been made in the Copyright Office?	
Yes INO	If your answer is "Yes," why is another registration being	sought? (Check appropriate box.) ▼ If your answer is No, do not check box	A, B, or C.
a. This is th	ne first published edition of a work previously registered in	unpublished form.	
	he first application submitted by this author as copyright cli		
c. This is a	changed version of the work, as shown by space 6 on this a	pplication.	
If your answer	r is "Yes," give: Previous Registration Number ▼	Year of Registration ♥	
DERIVATIV Preexisting M	TE WORK OR COMPILATION Complete both space faterial Identify any preexisting work or works that this wo	6a and 6b for a derivative work; complete only 6b for a compilation. ork is based on or incorporates. ▼	
THE PARTY NAMED IN			See instructions before completing
Material Add	ed to This Work Give a brief, general statement of the mate	erial that has been added to this work and in which copyright is claimed. $lacktriangledown$	this space.
DEPOSIT A Name ▼	CCOUNT If the registration fee is to be charged to a Dep	osit Account established in the Copyright Office, give name and number of A Account Number ♥	ccount.
JoAnna Me Majesty Lav 9719 Pulask Middle Rive Area code and d	rcedes Esty, Esq. w Group ki Highway er, MD 21220 laytime telephone number (410) 686 6072	nce about this application should be sent. Name/Address/Apt/City/State/2	ip♥
Email Jmesty	@majestylaw.com		
CERTIFICA	TION* 1, the undersigned, hereby certify that I am the	(Dauther	
		Dether convisions claimant	
	Check only one ▶	Oumer of evolucing right(s)	
		other copyright claimant owner of exclusive right(s) of Inglewood authorized agent of	
		Name of author or other copyright claimant, or owner of exclusive	e right(s) A
	of the work identified in this application and that	the statements made by me in this application are correct to the best of my kn	owledge.
Typed or prin	ted name and date ▼ If this application gives a date of pub	lication in space 3, do not sign and submit it before that date.	
	ercedes Esty	2/2/2015 Date	
	Handwritten signature (X)	Esty	
Certificate will be mailed in	Name ▼ JoAnna Mercedes Esty, Majesty Law Group	IN THE SAME PACK	space 8
window envelope to this	Number/Street/Apt ▼ 9719 Pulaski Highway	Application form Nonrefundable filing fe ey order payable to Regi: Deposit material Aut 1.1.	e in check or mon- ster of Copyrights

Michelle Teiver, MD 21220

Ubrary of Congress Copyright Office-PAD 101 Independence Avenue SE Washington, DC 20559-6230

*17 U.S.C. §506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filled in connection with the application, shall be fined not more than \$2.500.

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For a Work of Performing Arts UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

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rivacy Act Notice: Sections 408-410 of title 17 of the United States
ode authorize the Copyright Office to collect the personally identifying
formation requested on this form in order to process the applica-
on for copyright registration. By providing this information you are
greeing to routine uses of the information that include publication
give legal notice of your copyright claim as required by 17 U.S.C.
'05. It will appear in the Office's online catalog. If you do not provide
e information requested, registration may be refused or delayed.
nd you may not be entitled to certain relief, remedies, and benefits
nder the copyright law.

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Month	Day	Year

DO NOT WRITE AROVE THIS I ME	IE VOLLMEED MODE COACE LICE A	SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK ▼ City of Inglewood, Council M	eeting 8/27/2013				
PREVIOUS OR ALTERNATIVE	TITLES ▼				*···
NATURE OF THIS WORK ▼ Se	ee instructions				
Motion Picture/ AV Work					
NAME OF AUTHOR TO City of Inglewood, Employe	er		ATES OF BIR ear Born ▼	TH AND DEAT Year Died	
Was this contribution to the work a "work made for hire"? Yes No	AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of Domiciled in Inglewood, CA	A	VAS THIS AU HE WORK nonymous? seudonymous?	THOR'S CONT Yes No Yes No	RIBUTION TO If the answer to either of these questions is "Yes," see detailed instructions.
NATURE OF AUTHORSHIP B	riefly describe nature of material created by this author in				
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See instructions before completing this space.

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employer, not the employer, for any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person tor whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

MORE ON BACK ▶ • Complete all applicable spaces (numbers 5-9) on the reverse side of this page.

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viateriai Addi	ed to This Work Give a brief, general statement of the material that has be	en added to this work and in which co	pyright is claimed. V	37
Name V		unt Number ♥		
oAnna Me Iajesty Lav 719 Pulask	di Highway	application should be sent. Name/Add	ress/Apt/City/State/Zip♥	
	er, MD 21220 laytime telephone number (410) 686 6072	Fax number (888) 618	0360	
Email jmesty	@majestylaw.com		occupation of	
CERTIFICA	Owner	copyright claimant of exclusive right(s) ized agent of		
	of the work identified in this application and that the statements		aimant, or owner of exclusive right(s) A rect to the best of my knowledge.	
AND THE RESERVE OF THE CAMER	ted name and date $lacktriangledown$ If this application gives a date of publication in spacecreedes. Esty	e 3, do not sign and submit it before th Date	2/2/2015	
	Tandwritten signature (X) ▼			
Certificate will be	Name ▼ JoAnna Mercedes Esty, Majesty Law Group	0	YOU MUST: Complete all necessary spaces Sign your application in space 8 SEND ALL 3 ELEMENTS	
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address:	Michier River, MD 21220		3. Deposit material MAIL To: Library of Congress Copyright Office-PAD 101 Independence Avenue SE Machineton DC 20559-6244	

^{*17} U.S.C. §505(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.